

1 HEATHER E. WILLIAMS, CA SBN #122664
Federal Defender
2 REED GRANTHAM, CA SBN #294171
Assistant Federal Defender
3 Office of the Federal Defender
2300 Tulare Street, Suite 330
4 Fresno, CA 93721-2226
Telephone: (559) 487-5561
5 Fax: (559) 487-5950

6 Attorneys for Defendant
SHAWN CORTEZ
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 SHAWN CORTEZ,

15 Defendant.
16

Case No. 1:25-cr-00027-KES-BAM

STIPULATION TO CONTINUE STATUS
CONFERENCE; AND ORDER

17 IT IS HEREBY STIPULATED, by and between the parties through their respective
18 counsel, Assistant United States Attorney Michael Tierney, counsel for plaintiff, and Assistant
19 Federal Defender Reed Grantham, counsel for Shawn Cortez, that the status conference currently
20 scheduled for May 28, 2025, at 1:00 p.m. may be continued to August 27, 2025, at 1:00 p.m.

21 The parties agree and stipulate, and request that the Court find the following. Initial
22 discovery has been provided in this matter. The defense is in the process of reviewing this
23 discovery, discussing the discovery with his client, and researching and investigating all aspects
24 of this case. The government has indicated that it is in the process of preparing a plea agreement
25 and that a plea agreement will be forthcoming. In order to continue review of the discovery and
26 investigation into this matter, and to review and discuss the anticipated plea agreement with Mr.
27 Cortez, the parties are in agreement to continue this matter to August 27, 2025, for a further
28 status conference.

Additionally, Mr. Cortez is currently participating in the Teen Challenge Reedley year-long residential treatment and rehabilitation program. Counsel for Mr. Cortez was provided a status report regarding Mr. Cortez dated May 20, 2025, and counsel has provided that report to counsel for the government. It indicates that Mr. Cortez entered the program on February 10, 2025, and that he has been “a model student is hard-working, shows integrity, displays servant leadership, follows directions and is very helpful around the campus.”

The requested continuance will conserve time and resources for the parties and the Court. Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The government does not object to the continuance.

Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period to August 27, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

Respectfully submitted,

MICHELE BECKWITH
Acting United States Attorney

Date: May 21, 2025

/s/ Michael Tierney
MICHAEL TIERNEY
Assistant United States Attorney
Attorney for Plaintiff

HEATHER E. WILLIAMS
Federal Defender

Date: May 21, 2025

/s/ Reed Grantham
 REED GRANTHAM
 Assistant Federal Defender
 Attorney for Defendant
 SHAWN CORTEZ

ORDER

IT IS SO ORDERED that the status conference is continued from May 28, 2025, to **August 27, 2025, at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe.** Time is excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv).

IT IS SO ORDERED.

Dated: **May 21, 2025**

/s/ *Barbara A. McAuliffe*
UNITED STATES MAGISTRATE JUDGE